

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION**

In re: Brian Pendo and Amanda Pendo, Debtors. Brian Pendo and Amanda Pendo, Movant v. PNC Bank, National Association Respondents.	Bankruptcy 24-20784-CMB Chapter 13 Related to Doc. No. 42
---	--

**LIMITED RESPONSE TO MOTION FOR SALE OF PROPERTY UNDER SECTION
363(B) 331 STATE STREET, CHARLEROI, PA 15022**

PNC Bank, National Association ("Secured Creditor"), by and through its undersigned attorney, hereby files its Limited Response to Motion For Sale of Property under Section 363(b) 331 State Street, Charleroi, PA 15022 ("Motion") (DE#42) and in support thereof states as follows:

1. Secured Creditor holds a first lien on the subject property located at 331 State Street, Charleroi, PA 15022 (the "Property").
2. This Court has exclusive jurisdiction over the property in question under 28 USC Section 1334.
3. On June 13, 2024, the Debtor filed the instant Motion to Sell Property (the "Motion"). The Debtor's Motion seeks the Court's approval to sell the Subject Property for \$301,500.00 (the "Proposed Sale Price").
4. As of June 28, 2024, the estimated payoff owed on Secured Creditor's lien is \$64,237.69. Secured Creditor will provide an updated payoff at or near the scheduled closing of the sale.

5. Secured Creditor does not object to the Debtor's Motion to the extent that any sale is subject to Secured Creditor's lien and that Secured Creditor's lien will be paid in full at the closing of said sale based upon an up to date payoff quote.
6. Furthermore, Secured Creditor requests that failure to complete any sale within 90-days of entry of this Order will result in any Order authorizing the sale to be deemed moot.
7. Secured Creditor reserves the right to supplement this response at or prior to any hearing on this matter.

WHEREFORE, Secured Creditor respectfully requests entry of an order in compliance with the above conditions and for such other and further relief as the Court deems just and proper.

Dated: June 19, 2024

**Robertson, Anschutz, Schneid,
Crane & Partners, PLLC**
Attorney for Secured Creditor
13010 Morris Rd.
Suite 450
Alpharetta, GA 30004
Telephone: 817-873-3080
By: /s/ Michelle L. McGowan
Michelle L. McGowan, Esquire
Pennsylvania Bar No. 62414
Email: mimcgowan@raslg.com

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION**

In re:	Bankruptcy 24-20784-CMB
Brian Pendo and Amanda Pendo, Debtors.	Chapter 13
Brian Pendo and Amanda Pendo, Movant	Related to Doc. No. 42
v.	
PNC Bank, National Association Respondents.	

CERTIFICATE OF SERVICE

I certify under penalty of perjury that I served the above captioned pleadings at the addresses specified below on **June 19, 2024**

The types of service made on the parties were:

By First-Class Mail:

Brian Pendo
331 State Street
Charleroi, PA 15022

Amanda Pendo
331 State Street
Charleroi, PA 15022

Scott R. Lowden
Scott R. Lowden, Esq
100 Heathmore Avenue
Pittsburgh, PA 15227
Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

Office of the United States Trustee
1000 Liberty Avenue
Suite 1316
Pittsburgh, PA 15222

**Robertson, Anschutz, Schneid,
Crane & Partners, PLLC**
Attorney for Secured Creditor
13010 Morris Rd.
Suite 450
Alpharetta, GA 30004
Telephone: 817-873-3080
By: /s/ Michelle L. McGowan
Michelle L. McGowan, Esquire
Pennsylvania Bar No. 62414
Email: mimcgowan@raslg.com